

1 Law Office of Stephen Murphy  
2 STEPHEN MURPHY #207102  
3 622 Jackson St.  
Fairfield, CA 94533  
707-425-3358  
707-359-0211 Facsimile

4 Attorney for Debtor(s) Wendy Graves

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6 UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO

7 In re:

8 Wendy Graves  
9 XXX-XX-6877

Case No. 10-26083

DC No.: SNM-1  
DATE: APRIL 12, 2010  
TIME: 9:00 A.M.  
DEPT#: A - COURTROOM 28  
HONORABLE JUDGE MCMANUS

12 Debtor.

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14 **MOTION FOR AN ORDER APPROVING ABANDONMENT OF  
CERTIFIED REPORTING SERVICES (A SOLE PROPRIETORSHIP)**

15 TO THE HONORABLE BANKRUPTCY JUDGE,

16 The Motion of Wendy Graves respectfully represents:

- 17 1. Movant filed a voluntary petition for relief under Title 11 of the United States  
code on March 11, 2010.
- 18 2. At the time of the entry of the order for relief debtor was in possession of the  
following described property: Certified Reporting Services (a sole  
19 proprietorship), located at 801 East 2nd St, Suite 102, Benicia, CA 94510, and  
101 Lucas Valley Rd, Suite 160, San Rafael, CA 94901, consisting of personal  
20 property described on Schedule B and as more particularly described on  
debtor's declaration filed herewith.
- 21 3. The property so described is claimed as exempt by the debtor under CCP  
22 703.140(b)(6) and CCP 703.140(b)(5) and no administration by the trustee is

23                   contemplated.

- 24       4. Movants desire to continue to operate said business during the pending of the  
25                   bankruptcy proceeding and require an order of abandonment under Bankruptcy  
26                   Rule 6007.

27                   WHEREFORE, Movant prays that the trustee in the above-stated case be required to  
28                   abandon said personal property and for such other and further relief as is just and proper.

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30                   Dated: March 13, 2010

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30                   /s/ Stephen Murphy  
31                   STEPHEN MURPHY  
32                   Attorney for Movant